

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 21-cv-10928

Honorable Denise Page Hood

vs.

\$3,840,772.58 U.S. dollars constituting  
125 international wire transfers seized  
from U.S. correspondent bank, Citibank,  
between December 21, 2020 and  
January 4, 2021,

\$1,025,446.18 U.S. dollars constituting  
42 international wire transfers seized  
from U.S. correspondent bank, JPMorgan  
Chase Bank, between December 21, 2020  
and January 4, 2021,

\$765,143.73 U.S. dollars constituting  
40 international wire transfers seized  
from U.S. correspondent bank, Bank of  
New York Mellon, between December 21, 2020  
and January 4, 2021,

\$145,466.52 U.S. dollars constituting  
6 international wire transfers seized  
from U.S. correspondent bank, Mashreq  
Bank PSC, between December 21, 2020  
and January 4, 2021,

\$387,337.51 U.S. dollars constituting  
13 international wire transfers seized  
from U.S. correspondent bank, Standard  
Chartered Bank, between December 21, 2020  
and January 4, 2021,

\$159,616.77 U.S. dollars constituting  
6 international wire transfers seized  
from U.S. correspondent bank, Deutsche  
Bank Trust Company Americas, between  
December 21, 2020 and January 4, 2021,

\$2,288,936.63 U.S. dollars constituting  
67 wire transfers seized from U.S.  
correspondent bank, Citibank, N.A.,  
between May 3, 2021 and May 21, 2021,

\$1,449,112.82 U.S. dollars constituting  
44 wire transfers seized from U.S.  
correspondent bank, JPMorgan Chase Bank,  
between May 3, 2021 and May 21, 2021,

\$1,348,713 U.S. dollars constituting  
44 wire transfers seized from U.S.  
correspondent bank, Bank of America,  
between May 3, 2021 and May 21, 2021,

\$636,373.90 U.S. dollars constituting  
28 wire transfers seized from U.S.  
correspondent bank, Bank of New York Mellon,  
between May 3, 2021 and May 21, 2021,

\$20,155 U.S. dollars constituting  
2 wire transfers seized from U.S.  
correspondent bank, Deutsche Bank  
and Trust Company Americas, between  
May 3, 2021 and May 21, 2021, and

\$34,000 U.S. dollars constituting  
2 wire transfers seized from U.S.  
correspondent bank, Mashreq Bank PSC,  
between May 3, 2021 and May 21, 2021,

Defendants *in rem*.

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**APPLICATION FOR NUNC PRO TUNC ORDER  
UNSEALING AMENDED COMPLAINT (ECF NO. 5)**

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NOW COMES the United States of America, by and through SAIMA S. MOHSIN, Acting United States Attorney for the Eastern District of Michigan, and GJON JUNCAJ, Assistant United States Attorney, and hereby applies to this Court for a Nunc Pro Tunc Order unsealing the Amended Complaint filed on August 11, 2021, (ECF No. 5). On September 16, 2021, an unsealed Application for Leave to File Second Amended Complaint, (ECF No. 7), was filed by the government. Leave to file a Second Amended Complaint was subsequently approved on September 28, 2021, (ECF No. 8), and a Second Amended Complaint was filed on September 30, 2021, (ECF No. 9). The Second Amended Complaint is the operative complaint in this proceeding.

The government respectfully requests that all matters filed subsequent to the Second Amended Complaint, (ECF No. 9), be publicly filed unless otherwise ordered by the Court.

The government further requests this Court to enter the Nunc Pro Tunc Order unsealing the Amended Complaint filed on August 11, 2021, (ECF No. 5), which will be submitted to the Court via ECF utilities.

Respectfully submitted,

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Dated: October 21, 2021